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**Cr. No. 19-1306 JB**

**UNOPPOSED AMENDED MOTION TO AMEND CONDITONS OF RELEASE**

Defendant Lawrence Salazar, by and through counsel, hereby moves this Court to modify the conditions of release previously set in this case. Specifically, Defendant states as follows:

1. Defendant is a long-time resident of New Mexico and does not pose a flight risk.
2. Defendant has no felony history and has no history of crimes of violence.
3. On May 7, 2019, Defendant was charged with the offense of Impersonating a Federal Officer, in violation of 18 USC § 912.
4. On August 27, 2019, the Defendant pled guilty to the single count in the indictment. This is a *de minimus* offense insofar as the parties have agreed and stipulated, pursuant to Fed. R. Crim. P. 11(c)(1)(C), that the sentence in this case **will not** include either a term of incarceration or a term of supervised release.
5. A sentencing hearing has not yet to be scheduled as the parties are awaiting the completion of the Presentence Report.
6. On November 6, 2019, the Defendant was arrested for violating his conditions of release and the Court ordered that Defendant remain in custody pending the availability of bed space at La Pasada Halfway House.

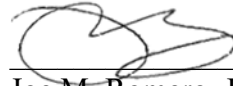
7. On today's date, November 7, 2019, after consultation with AUSA Norman Cairns and U.S. Pretrial Services Officer Anthony Carter, the parties have agreed that in light of the *de minimus* offense to which he pled, the "no time" sentencing agreement contained within the plea agreement, and the health crisis that his family is currently undergoing, Defendant should be released on his own recognizance pending his final sentencing hearing.

8. Opposing counsel, AUSA Norman Cairns, does not oppose this motion.

9. U.S. Pretrial Services Officer Anthony Carter does not oppose this motion.

Wherefore, based on the foregoing, Defendant Lawrence Salazar respectfully requests that his conditions of release be modified to allow Defendant to be released on his own recognizance pending his sentencing hearing.

Respectfully Submitted,



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